

Amy F. Sorenson, Esq.
Nevada Bar No. 12495
SNELL & WILMER L.L.P.
15 West South Temple, Suite 1200
Salt Lake City, UT 84101
Telephone: (801) 257-1900
Facsimile: (801) 257-1800
asorenson@swlaw.com

Kelly H. Dove, Esq.
Nevada Bar No. 10569
SNELL & WILMER L.L.P.
3883 Howard Hughes Parkway, Suite 1100
Las Vegas, NV 89169
Telephone: (702) 784-5200
Facsimile: (702) 784-5252
kdove@swlaw.com

*Attorneys for Defendant
Apartment Management Consultants, LLC*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA *ex rel.*
PEGGY THORNTON, Realtor,

and

PEGGY THORNTON,

Plaintiff,

vs.

PORTOLA DEL SOL OPERATOR, LLC, a
foreign limited-liability company; TMIF II
PORTOLA, LLC, a foreign limited-liability
company; APARTMENT MANAGEMENT
CONSULTANTS, LLC, a foreign limited
liability company; and RENE
RICHARDSON, as AGENT of PORTOLA
DEL SOL OPERATOR, LLC,

Defendants.

Case No. 2:21-cv-01123-APG-BNW

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO FILE
RESPONSE TO COMPLAINT**

(Third Request)

1 Plaintiff Peggy Thornton (“Plaintiff”) and Defendant Apartment Management Consultants,
2 LLC (“Defendant” or “AMC”) (collectively, the “Parties”), by and through their undersigned
3 counsel, for good cause shown, hereby stipulate and agree to extend AMC’s deadline to file its
4 response to Plaintiff’s Complaint [ECF No. 1] from March 10, 2023, to **March 24, 2023**, for the
5 following reasons and with the following background:

6 1. Plaintiff filed the Complaint on June 14, 2021 [ECF No. 1].

7 2. The Complaint was unsealed on December 9, 2022, upon the United States declining
8 intervention [ECF No. 18].

9 3. AMC’s response to the Complaint was originally due on January 18, 2023.

10 4. The Parties had informally agreed to extend the deadline to respond to February 1,
11 2023, prior to AMC retaining counsel.

12 5. Undersigned counsel, Snell & Wilmer L.L.P., was retained to represent AMC on or
13 about January 26, 2023.

14 6. The Parties previously stipulated to extend the deadline twice for AMC to respond
15 to the Complaint, to and including February 21, 2023, and March 10, 2023.

16 7. The Parties now agree to allow AMC an additional extension of time to respond to
17 the Complaint until March 24, 2023, which is supported by good cause.

18 8. While AMC and its counsel have worked diligently to evaluate the allegations in the
19 Complaint, they require modest additional time.

20 9. As AMC is not presently the property manager, it is taking additional time to locate
21 relevant documentation. Since the last stipulated extension, Plaintiff has generously provided AMC
22 with the underlying contracts and leases at issue in this dispute, which AMC’s counsel has been
23 analyzing to assess Plaintiff’s claims.

24 10. At the same time, undersigned counsel and their core litigation team has faced some
25 personal obstacles that have impeded their ability to work, including the post-partum
26 hospitalization of a spouse and a school-age child currently suffering from COVID.

11. This extension request is sought in good faith and is not made for the purpose of delay.

THEREFORE, the Parties respectfully request an extension for AMC to file its response to the Complaint until March 24, 2023.

Dated: March 10, 2023

Dated: March 10, 2023

NEVADA LEGAL SERVICES, INC.

SNELL & WILMER L.L.P.

By: /s/ Elizabeth S. Carmona

By: /s/ Kelly H. Dove

Elizabeth S. Carmona, Esq.

Amy F. Sorenson, Esq.

Kristopher S. Pre, Esq.

Nevada Bar No. 12495

530 S. 6th St.

SNELL & WILMER L.L.P.

Las Vegas, NV 89101

15 West South Temple, Suite 1200

Salt Lake City, UT 84101

Attorneys for Plaintiff Peggy Thornton

Kelly H. Dove, Esq.

Nevada Bar No. 10569

SNELL & WILMER L.L.P.

3883 Howard Hughes Parkway, Suite 1100

Las Vegas, NV 89169

*Attorneys for Defendant Apartment
Management Consultants, LLC*

ORDER

IT IS SO ORDERED

DATED: 3:59 pm, March 13, 2023



BRENDA WEKSLER

UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing **STIPULATION AND ORDER TO EXTEND DEADLINE TO FILE RESPONSE TO COMPLAINT** by method indicated below:

- ☐ **BY FAX:** by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m. pursuant to EDCR Rule 7.26(a). A printed transmission record is attached to the file copy of this document(s).
- ☐ **BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada addressed as set forth below.
- ☐ **BY OVERNIGHT MAIL:** by causing document(s) to be picked up by an overnight delivery service company for delivery to the addressee(s) on the next business day.
- ☐ **BY PERSONAL DELIVERY:** by causing personal delivery by, a messenger service with which this firm maintains an account, of the document(s) listed above to the person(s) at the address(es) set forth below.
- ☒ **BY ELECTRONIC SUBMISSION:** submitted to the above-entitled Court for electronic filing and service upon the Court's Service List for the above-referenced case.
- ☐ **BY EMAIL:** by emailing a PDF of the document listed above to the email addresses of the individual(s) listed below.

DATED March 10, 2023

/s/ Maricris Williams
An employee of SNELL & WILMER L.L.P.

4868-3485-1414